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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

KELLY WILSON, an individual,

Plaintiff,

vs.

THE WALT DISNEY COMPANY, a Delaware corporation; DISNEY ENTERPRISES, INC., a Delaware corporation; WALT DISNEY PICTURES, a California corporation; WALT DISNEY MOTION PICTURES GROUP, INC., a California corporation; and DOES 1 through 25, inclusive,

Defendants.

Case No. 3:14-cv-01441-VC

**ADMINISTRATIVE MOTION TO FILE
UNDER SEAL EXHIBITS TO
DECLARATION OF MISCHA N.
BARTEAU IN SUPPORT OF
PLAINTIFF'S MOTION FOR PARTIAL
SUMMARY JUDGMENT**

Judge: Hon. Vince G. Chhabria

Date: April 9, 2015

Time: 10:00 a.m.

Ctrm: 4

TO DEFENDANTS AND THEIR ATTORNEYS OF RECORD HEREIN:

PLEASE TAKE NOTICE THAT, pursuant to Local Rules 79-5 and 7-11, Plaintiff Kelly Wilson ("Plaintiff") submits this Administrative Motion to Seal the following exhibits to the Declaration of Mischa N. Barteau in Support of Plaintiff's Motion for Partial Summary Judgment: 1, 20-41, 43-52 and 54-67.

Plaintiff submits this Administrative Motion solely in deference to the confidentiality designations made by Defendants in this action under the Confidentiality Stipulation and Protective Order (Doc. 47) entered by the Court in this action. Defendants have asserted confidentiality as to almost all documents produced by Defendants in this action and as to the entirety of most of the depositions taken by Plaintiff in this action. By filing this Administrative Motion, Plaintiff neither concedes nor supports the sealing of the documents as to which Defendants have asserted confidentiality. Rather, Plaintiff submits that sealing should not be considered by the Court absent a clear, compelling and convincing reason to except these documents from the general rule that judicial records are public records. *See In re NVIDIA Corp. Derivative Litigation No. 125*, 2008 WL 1859067, at *3 (N.D. Cal. 2008).

Dated: March 5, 2015

ARIAS OZZELLO & GIGNAC LLP

By: 

J. Paul Gignac
Mischa N. Barteau

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Kelly Wilson